

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

MARK ANTHONY PALZER,)	
)	
Plaintiff,)	
)	Case No. 15-CV-564-GKF-JFJ
v.)	
)	
COXCOM, LLC,)	
)	
)	
Defendant.)	

**PLAINTIFF MARK PALZER'S SECOND APPLICATION
FOR ENLARGEMENT OF DEADLINE TO RESPOND TO
DEFENDANT'S MOTION TO STRIKE**

Plaintiff Mark Palzer ("Palzer" or "Plaintiff"), pursuant to LCvR 7.2(g), hereby respectfully moves this Court for an order granting Plaintiff until Monday, December 17, 2018, within which to file his brief in response to the *Motion to Strike Plaintiff's Response to Defendant's Motion for Summary Judgment [Dkt. #143]* submitted by Defendant CoxCom, LLC ("Cox" or "Defendant"). In support of this *Application*, Plaintiff would show the Court as follows:

STATEMENT OF COMPLIANCE

Pursuant to LCvR 7.2(g), Plaintiff's counsel, Christopher L. Camp, states that due to the late hour at which the instant *Application* is being filed, he is unable to attempt to contact William O'Connor or Keith Wilkes, co-counsel for Defendant, regarding the relief requested herein. Camp would certify, however, that yesterday, December 13, 2018, he attempted to contact Messrs. O'Connor and Wilkes both by way of telephone and e-mail regarding related issues, but neither counsel acknowledged or responded to these attempts to communicate. For these reasons, the Court should assume that Cox objects to the extension requested by this *Application*.

FACTS

1. On November 13, 2018, Defendant CoxCom, LLC filed its *Motion to Strike Plaintiff's*

Response to Defendant's Motion for Summary Judgment.

2. Since the filing of Cox's *Motion to Strike*, Plaintiff's attorney Christopher Camp, a solo practitioner, has had numerous briefing and discovery deadlines, voluminous work to complete in connection with the dissolution of a company currently in receivership, and additional obligations in his other cases warranting his immediate attention.
3. Accordingly, on Friday, December 7, 2018, the undersigned requested an additional seven (7) days within which to respond to Cox's *Motion to Strike*,
4. Since that time, aside from a handful of court appearances, several client meetings, and work on certain time-sensitive administrative matters, counsel has devoted the lion's share of his time to the diligent preparation of Plaintiff's response to Cox's *Motion to Strike*. However, given the broad topical and temporal scope of Cox's various assertions (to which the undersigned must fully respond and, to the extent possible, rebut with evidence and/or analogous legal authorities), counsel will not be able to complete Plaintiff's response by the midnight deadline. Nevertheless, counsel will be able to finish drafting and assembling Plaintiff's response over the weekend in time for submission on Monday.
5. As previously stated, Plaintiff has made one previous request to extend the deadline for responding to the aforementioned *Motion*.
6. Since the Court has stricken all deadlines in this case, including Cox's deadline for filing a reply brief in support of its *Motion for Summary Judgment*, granting this extension will not affect any other deadlines in the case, nor will it unduly prejudice Defendant.
7. Further, the interests of justice and fairness would best be served by allowing Plaintiff and his counsel the additional time now requested so that counsel may present fully-developed arguments in opposition to the above-referenced motion which seeks dispositive relief and sanctions.

WHEREFORE, premises considered, Plaintiff Mark Palzer hereby prays that this Court enter an order (a) granting Plaintiff until Monday, December 17, 2018, within which to file his brief in response to the *Motion to Strike* [Dkt. #141] submitted by Defendant CoxCom, LLC; and (b) granting Plaintiff all other relief (whether legal, equitable, or both) to which he may be entitled or that the Court deems just and proper.

Respectfully submitted:

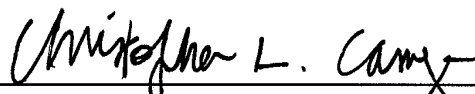
CAMP LAW FIRM

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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2018, I electronically transmitted the foregoing instrument to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

William W. O'Connor, Esq.
Margo Shipley, Esq.
William Deveney, Esq.


Christopher L. Camp, OBA #18541